

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
v.)	No. 4:16 CR 83 HEA/NCC
)	
MICHAEL BRUCE MCDONALD)	
)	
Defendant.)	

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE PRETRIAL MOTIONS

COMES NOW defendant MICHAEL BRUCE MCDONALD, through his attorney, Robert C. Wolfrum, Assistant Federal Public Defender, to move this Court to grant an additional thirty days to file pretrial motions or a waiver in this cause. Counsel additionally moves that any hearing on motions be continued. As grounds for this request, undersigned counsel states that he has met with Mr. McDonald on multiple occasions.

Counsel, after discussions with his client and the United States Attorney has determined that it will be necessary to file pretrial motions. The motions are of some potential complexity because some things relevant to the motions occurred in a foreign country. This fact has made more legal research than counsel initially anticipated necessary. When motions are completed, counsel also needs time to discuss them with Mr. McDonald.

Discovery received to date in this case is of considerable size. Additionally, there have been search warrants executed in this case concerning computers and the person of the defendant. Defense counsel received a report concerning the examination of computers and a cell phone. This case also may involve issues regarding information technology and computers concerning which undersigned counsel

has sought learned assistance. Counsel has requested a copy of the contents of some seized computers which may be the topic of a motion to suppress. The case also potentially involves matters alleged to have occurred in other jurisdictions and a foreign country. This case may involve a seizure of items in a foreign jurisdiction. Counsel needs additional time to review the law and craft any motions that need to be filed.

Counsel also had a jury trial the week of September 6, 2016, which lasted for the greater part of that week. That case also was of considerable complexity.

The following week, September 12, undersigned counsel is the duty attorney for the office.

Both of these tasks consumed a great deal of the time of undersigned counsel and made work on this case impossible during most of that period.

Counsel is acting as expeditiously as possible.

Counsel has discussed this request for additional time with the United States Attorney handling the case, who does not oppose this request. Both attorneys have indicated to the Court that this request for additional time would be forthcoming.

The ends of justice served by time for defendant's counsel to fully and competently prepare and consider options outweigh the interest of the defendant and the public in a speedy and public trial.

By reason of the foregoing, defendant requests an additional thirty days to file pretrial motions or a waiver in this cause. Counsel additionally moves that any hearing on motions be continued.

Respectfully submitted,

/s/Robert C. Wolfrum
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2016, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Rob Livergood, Assistant United States Attorney.

/s/Robert C. Wolfrum

ROBERT C. WOLFRUM

Assistant Federal Public Defender